REMARKS

Reconsideration of the present application is respectfully requested. No claims have been amended. No claims have been canceled or added in this response. No new matter has been added.

Claim Rejections §103

Independent claims 11, 27, 39, 42, 49 and 58 stand rejected under 35 U.S.C. §103(a) based on Geiger et al. (U.S. Patent no. 6,463,534) in view of Newton (U.S. Pub. No. 2003/0035547). Applicants respectfully traverse the rejections.

Claim 11 recites:

> 11.   A method comprising:
> obtaining a first domain name provided by a client;
> retrieving a second domain name from a digital certificate;
> comparing the first domain name and the second domain name; and
> **accessing a data structure to determine whether the first domain name is mapped to the second domain name if the first domain name and the second domain name do not match.**
> (Emphasis added).

The Examiner acknowledged that Geiger does not teach or suggest <u>accessing a data structure to determine whether the first domain name is mapped to the second domain name if the first domain name and the second domain name do not match</u>, but alleged that Newton's paragraphs 113-114 and 127-128 teach or suggest the limitation. Applicants have analyzed the cited paragraphs, but finds no discussion, or even a hint, regarding <u>accessing a data structure to determine whether the first domain name is mapped to the second domain name if the first domain name and the second domain name do not match</u>, as recited in claim 11.

Specifically, Newton's paragraph 114 discloses a method which protects against a Man-in-the-Middle attack. According to the method, if the domain name in the server's certificate

does not match the domain name of the server, clients must refuse to authenticate the server. Thus, the method does not teach or suggest accessing a data structure to determine whether the first domain name is mapped to the second domain name if the first domain name and the second domain name do not match, for example, accessing a mapping table to determine whether the domain name in the server's certificate is mapped to the domain name of the server.

Newton's paragraphs 127-128 concern the concepts of "certificate", "digital signature", "public key", etc. Paragraphs 127-128 contain no discussion regarding accessing a data structure to determine whether the first domain name is mapped to the second domain name if the first domain name and the second domain name do not match, such as recited in claim 11.

On page 15 of the final office action mailed on 10/19/2006, the Examiner asserts that Applicants just provided a "general allegation that the claims define a patentable invention without specifically pointing out how the language of the claims patentably distinguishes them from the references". Further, the Examiner alleges that "Applicants' assertions are just mere allegation with no supported fact." Applicants respectfully disagree.

The above reasons presented are not mere allegations. They are concrete reasons why the claims are patentable over the cited art. The specific argument that the prior art does not teach or suggest the claim limitation of accessing a data structure to determine whether the first domain name is mapped to the second domain name if the first domain name and the second domain name do not match is not a mere "general allegation". The fact that the cited sections and the rest of Newton do not teach or suggest the discussed limitation is the supporting fact that the present claims are patentable over the cited art. In the absence of more specificity by the Examiner to explain the rejections, Applicants fail to see how they could be any more specific.

Thus, at least for the foregoing reasons, Newton does not teach the limitation of <u>accessing</u> <u>a data structure to determine whether the first domain name is mapped to the second domain</u> <u>name if the first domain name and the second domain name do not match</u>. Neither does Geiger disclose or suggest this limitation. Therefore, Geiger and Newton, individually or in combination, do not teach or suggest all limitations of claim 11. Therefore, claim 11 and all claims which depend on it are patentable over Geiger and Newton.

The other independent claims contain limitation similar to that discussed for claim 11 above. For similar reasons, therefore, all of the other independent claims and the claims which depend on them are also patentable over Geiger and Newton.
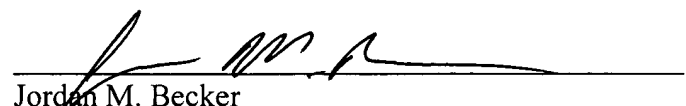
Dependent Claims

In view of the above remarks, a specific discussion of the dependent claims is considered to be unnecessary. Therefore, Applicants' silence regarding any dependent claim is not to be interpreted as agreement with, or acquiescence to, the rejection of such claim or as waiving any argument regarding that claim.

For the foregoing reasons, the present application is believed to be in condition for allowance, and such action is earnestly requested.

If any additional fee is required, please charge Deposit Account No. 02-2666.

Respectfully submitted,
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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Jordan M. Becker
Reg. No. 39,602

Customer No. 26529
12400 Wilshire Boulevard
Seventh Floor
Los Angeles, CA 90025-1030
(408) 720-8300